REMARKS

In the Office Action[1] mailed April 21, 2009, ("Office Action"), the Examiner objected to claims 9-13 because of informalities; rejected claims 1, 3, 4, 9, and 11-14 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,990,906 ("*Hudson*") in view of U.S. Patent No. 6,377,964 ("*Sano*"); rejected claim 2 under 35 U.S.C. § 103(a) as being unpatentable over *Hudson* in view *Sano*, and in further view of "HTML 4.01 Specification," December 1999 ("*HTML1999*"); rejected claims 5 and 6 under 35 U.S.C. § 103(a) as being unpatentable over *Hudson* in view *Sano*, and in further view of U.S. Patent No. 6,167,455 to Friedman et al. ("*Friedman*"); and rejected claim 10 under 35 U.S.C. § 103(a) as being unpatentable over *Hudson* in view *Sano*, and in further view of U.S. Patent No. 6,543,006 to Zundel et al. ("*Zundel*").

By this amendment, Applicants have amended claims 1, 3, 4-6, 9-11, and 14. Support for these amendments can be found in Applicants' specification at, for example, p. 4, lines 15-19 and p. 6, line 12 - p. 7, line 3. No new matter has been added. Accordingly, claims 1-6 and 9-14 remain pending.

In light of the foregoing amendments and based on the reasoning presented below, Applicants respectfully traverse the objections to the claims. In addition, Applicants respectfully traverse the rejection of the claims under 35 U.S.C. § 103(a), and request allowance of pending claims 1-6 and 9-14.

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[1] The Office Action contains statements characterizing the related art and the claims. Regardless of whether any such statements are specifically identified herein, Applicants decline to automatically subscribe to any statements in the Office Action.

Claim Objections

The Examiner objected to claims 9-13 for reciting "the restored state," "the control," and "the stored data." *See* Office Action, p. 2. Applicants traverse this objection but to advance prosecution Applicants have amended claim 9 as the Examiner suggested. The Examiner objected to claims 10-13 because of their dependence from claim 9. The amendment to claim 9 cures any alleged deficiency of claims 10-13.

In light of the foregoing amendments, Applicants respectfully request reconsideration and withdrawal of the objection to claims 9-13.

Claim Rejections

Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1, 3, 4, 9, and 11-14 under 35 U.S.C. § 103(a) as being unpatentable over *Hudson* in view of *Sano*. In order to have a proper rejection under 35 U.S.C. § 103(a), the Examiner must properly resolve the *Graham* factual inquiries, the proper resolution of which is the requirement for establishing a framework for an objective obviousness analysis and demonstrating a *prima facie* case of obviousness. *See* M.P.E.P. § 2141(II), citing to *Graham v. John Deere Co.*, 383 U. S. 1, 148 USPQ 459 (1966), as reiterated by the U.S. Supreme Court in *KSR International Co. v. Teleflex Inc.*, 550 U.S. 398, 82 USPQ2d 1385 (2007). In order to demonstrate a *prima facie* case of obviousness, among other things, the Examiner must properly determine the scope and content of the prior art and must properly ascertain the differences between the claimed invention and the prior art, as required under M.P.E.P. § 2141. The Office Action does

not establish a *prima facie* case of obviousness at least because the Examiner incorrectly interprets the contents of *Hudson* and *Sano* and consequently misses the sizable differences between the references and the claimed invention.

Claim 1, as amended, recites, *inter alia*:

> displaying a user interface in a client program, the user interface having a plurality of controls, the plurality of controls including multiple types of controls, each control of the plurality of controls having a state and a control data structure, wherein each control data structure corresponds to one control, and wherein the state of each control includes a data state and a view state;
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> . . .
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> receiving first user input comprising a first change to the state of a first control in the plurality of controls;
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> updating the state of the first control based on the first user input;
>
> storing the updated state of the first control as a second state for the first control in the control data structure corresponding to the first control;
>
> receiving second input from the user comprising a second change to the state of a second control in the plurality of controls;
>
> updating the state of the second control based on the second user input;
>
> storing the updated state of the second control as a second state for the second control in the control data structure corresponding to the second control;
>
> receiving third user input comprising a request to undo the first change to the first control;
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> . . .

> restoring the state of the first control to reflect the first state for the first control without affecting the state of the second control;
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> . . .
>
> clearing the stored first state for the first control and the stored second state for the first control from the control data structure corresponding to the first control without affecting the control data structure corresponding to the second control.

Hudson in view of *Sano* does not teach or suggest at least these elements of claim 1. In particular, *Hudson* teaches an undo/redo method for graphical programming which minimizes data storage. *See Hudson*, Abstract. The method uses a backup list for each transaction for backing up an edit change, which comprises a list of paired "ObjIDs" which indicate the current and previous entries. *See Hudson*, 13:5-9. The method also uses a backup list list, that is, a list containing all the generated backup lists. *See Hudson*, 13:11-13. When undoing and action, *Hudson* teaches undoing the last action performed, that is, undoing the last change made, which affects the last backup list in the backup list list. *See Hudson* 15:43-16:6. *Hudson's* system cannot restore the state of a first control without affecting the state of a second control that was changed at a later time because the second control action is a later action, and thus comes last on *Hudson's* list. Accordingly, *Hudson* does not teach the above-quoted claim 1 recitations.

Moreover, *Sano* also does not teach the above-quoted recitations of claim 1. *Sano* teaches a CAD system for team-based design providing an undo/redo function. *See Sano*, Abstract. But, similar to *Hudson*, *Sano* teaches undoing the last change

performed by a user, i.e., the last change performed in time such that an earlier change cannot be undone with affecting a later change. *See Sano*, 10:55-58, 11:3-7, 13:42-46, and Fig. 30.

Accordingly, neither *Hudson*, nor *Sano*, nor their combination, teach or suggest the above-quoted elements of claim 1. Moreover, these elements represent at least some of the substantial differences between the claimed invention and the cited art, and render claim 1 nonobviousness. For at least these reasons, claim 1 is not obvious over *Hudson* and *Sano*, whether taken alone or in combination. Independent claim 1 is therefore allowable.

Additionally, claim 1 is also allowable for another reason. The Office Action alleged that *Hudson* teaches "clearing the stored first state for the control and the stored second state for the control from the control data structure," as recited in claim 1. *See* Office Action, p. 15. But the Office Action misinterpreted the scope and content of the *Hudson* reference. *Hudson* discloses an undo limit that allows the user to set a maximum number of undos, and purges any undo information beyond this limit. *See Hudson*, 9:24-30. If, for example, the user set the undo limit to "5" then undo "6" and "7" may be purged. This does not, however, teach "clearing the stored first state for the first control and the stored second state for the first control from the control data structure corresponding to the first control." In order to clear the stored first state for the first control and the stored second state for the first control, *Hudson*'s undo limit would have to be set to zero, which would disable the undo functionality. In fact, *Hudson* expressly states that "[i]f the minimum number of steps is 0, undo is disabled". *Hudson*,

8:11-12. Disabling the undo function teaches away from the claimed invention, and further, would render the *Hudson* system unfit for its intended purpose. Moreover, *Sano* does not cure this deficiency. Accordingly, for this additional reason, the Office Action does not establish a *prima facie* case of obviousness for claim 1 based on the combination of *Hudson* and *Sano*.

For at least these reasons, claim 1 is not obvious over *Hudson* and *Sano*, whether taken alone or in combination. Independent claim 1 is therefore allowable. Dependent claims 3 and 4 are also allowable at least by virtue of their dependence from base claim 1, as well as by virtue of reciting additional features not taught nor suggested by the cited references. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a), and request allowance of independent claim 1, as well as dependent claims 3 and 4.

Independent claim 9, although of differing scope, recites elements similar to those of independent claim 1. Independent claim 9 is therefore allowable for similar reasons. Dependent claims 11-13 are also allowable at least by virtue of their dependence from base claim 9, as well as by virtue of reciting additional features not taught nor suggested by the cited references. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a), and request allowance of independent claim 9, as well as dependent claims 11-13.

Similarly, independent claim 14, although of differing scope, recites elements similar to those of independent claim 1. Independent claim 14 is therefore allowable for similar reasons. Therefore, Applicants respectfully request reconsideration and

withdrawal of the rejection under 35 U.S.C. § 103(a), and request allowance of independent claim 14.

In addition, Applicants request reconsideration and withdrawal of the rejection of claim 2 under 35 U.S.C. § 103(a) as being unpatentable over *Hudson* and *Sano*, in further view of *HTML1999*. A prima facie case of obviousness has not been established because, among other things, the cited art fails to teach or suggest each and every element of Applicants' claims.

The Examiner cites *HTML1999* as teaching "wherein the multiple types of controls include one or more of a text field control type, a radio button control type, a table control type, a tray control type, and a menu control type" (Office Action, pp. 11-12). However, even if the Examiner's characterization is correct, this does not cure the deficiencies set forth above for *Hudson* and *Sano*.

For at least the above-outlined reasons, neither *Hudson*, nor *Sano*, nor *HTML1999*, nor any combination thereof, teaches or suggests the combination of elements of claim 1, from which claim 2 depends. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a), and allowance of claim 2.

In addition, Applicants request reconsideration and withdrawal of the rejections of claims 5 and 6 under 35 U.S.C. § 103(a) as being unpatentable over *Hudson* and *Sano*, in further view of *Friedman*. A prima facie case of obviousness has not been established because, among other things, the cited art fails to teach or suggest each and every element of Applicants' claims.

In regard to claim 5, the Examiner cited *Friedman* as teaching "wherein the user input comprising the request to undo the change is received while focus in not on the control" (Office Action, pp. 12-13). Even assuming the Examiner's characterization of *Friedman* is correct, *Friedman* fails to cure the deficiencies of *Hudson* and *Sano*, as discussed above.

Similarly, in regard to claim 6, the Examiner cited *Friedman* as teaching "wherein restoring the state of the control includes restoring the state of another control that shares data with the control" (Office Action, p. 13). Even assuming the Examiner's characterization of *Friedman* is correct, *Friedman* fails to cure the deficiencies of *Hudson* and *Sano*, as discussed above.

For at least the above-outlined reason, neither *Hudson*, nor *Sano*, nor *Friedman*, nor any combination thereof, teaches or suggests the combination of elements of claim 1 from which claims 5 and 6 depends. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a), and allowance of claims 5 and 6.

In addition, Applicants request reconsideration and withdrawal of the rejection of claim 10 under 35 U.S.C. § 103(a) as being unpatentable over *Hudson* and *Sano*, in further view of *Zundel*. A prima facie case of obviousness has not been established because, among other things, the cited art fails to teach or suggest each and every element of Applicants' claims.

The Examiner cites *Zundel* as teaching "wherein the at least one of the plurality of data structures is at least one data tree" (Office Action, p. 14). However, even if the

Examiner's characterization is correct, this does not, *inter alia*, cure the deficiencies set forth above for *Hudson* and *Sano*.

For at least the above-outlined reasons, neither *Hudson*, nor *Sano*, nor *Zundel*, nor their combination, teaches or suggests the combination of elements of claim 9, from which claim 10 depends. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a), and allowance of claim 10.

Conclusion

Applicants request reconsideration of the application and withdrawal of the rejections. Pending claims 1-6 and 9-14 are in condition for allowance, and Applicants request a favorable action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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